

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

	X	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et</i>	:	(Jointly Administered)
<i>al.</i> ,	:	
	:	
Debtors. <sup>1</sup>	X	

**MOTION TO INFORM APPEARANCE OF CANTOR-KATZ COLLATERAL  
MONITOR LLC AT AUGUST 4-5, 2021 OMNIBUS HEARING**

**TO THE HONORABLE COURT:**

**COME NOW** Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company which serves as the collateral monitor for Wilmington Trust, N.A. in connection with the new bonds issued by the GDB Debt Recovery Authority (the “DRA”) pursuant to the *Government Development Bank for Puerto Rico Debt Restructuring Act*, Act No. 109-2017, as amended by Act No. 147-2018 and the approved Qualifying Modification for the Government Development Bank

---

<sup>1</sup> The Debtors in these title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

for Puerto Rico<sup>2</sup> under Title VI of the *Puerto Rico Oversight, Management and Economic Stability Act* (the “Collateral Monitor”), by and through the undersigned legal counsel, hereby submits this motion to inform (the “Informative Motion”) pursuant to this Honorable Court’s *Order Regarding Procedures for August 4-5, 2021 Omnibus Hearing* [Dkt. No. 17522] (the “Procedures Order”),<sup>3</sup> and respectfully states as follows:

1. Douglas S. Mintz of Schulte Roth & Zabel LLP will appear on behalf of Collateral Monitor at the omnibus hearing (the “Hearing”), which will be conducted telephonically via CourtSolutions.
2. Mr. Mintz may present oral argument related to the following:
  - a. *The DRA Parties’ Motion and Memorandum of Law in Support of Their Motion for Relief From the Automatic Stay, or in the Alternative, Ordering Payment of Adequate Protection* [Case No. 17-03567, ECF No. 591];
  - b. *The DRA Parties’ Amended Motion and Memorandum of Law in Support of Their Request for Adequate Protection or Relief from the Automatic Stay* [Case No. 17-03567, ECF No. 998];
  - c. *The Government Parties Objection to the DRA Parties’ Standing to Seek Relief from the Automatic Stay or in the Alternative, Ordering Payment of Adequate Protection* [Case No. 17-03567, ECF No. 1009];
  - d. *Joinder of Official Committee of Unsecured Creditors in Support of Government Parties’ Objection to DRA Parties’ Standing to Seek Relief from Automatic Stay or in Alternative, Ordering Payment of Adequate Protection* [Case No. 17-03567, ECF No. 1010];
  - e. *The DRA Parties’ Response to the Government Parties Objection to the DRA Parties’ Standing to Seek Relief from the Automatic Stay or in the Alternative, Ordering Payment of Adequate Protection* [Case No. 17-03567, ECF No. 1021];
  - f. *The Government Parties’ Reply Solely Regarding the DRA Parties’ Standing to Seek Relief From the Automatic Stay or in the Alternative,*

---

<sup>2</sup> See Dkt. No. 270 of Civil Case No. 18-01561 (LTS).

<sup>3</sup> Capitalized terms used herein and otherwise not defined shall have the meaning ascribed to such term in the Procedures Order.  
DOC ID - 36877705.2

*Ordering Payment of Adequate Protection* [Case No. 17-03567, ECF No. 1046]; and

g. Any other responses or filings related to the foregoing.

3. In addition, the Collateral Monitor reserves the right to be heard and present oral argument to address any matter identified in the agenda to be filed by the Oversight Board in connection with the Hearing, or raised by any party at the Hearing related to the Title III cases or any adversary proceeding which may affect the interests of the DRA. The Collateral Monitor reserves the right to amend this Informative Motion as needed.

4. Carmen D. Conde Torres, Esq. and Luisa S. Valle Castro, Esq. of C. Conde & Assoc., as local counsel for the Collateral Monitor, will attend the Hearing through the listen-in access lines provided by the Court.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 29th day of July 2021.

**WE HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system including the US Trustee and to all those parties registered to receive notice within the electronic notification service.

**C. CONDE & ASSOC. LAW OFFICES**

By: /s/ Carmen D. Conde Torres

Carmen D. Conde Torres

(USDC No. 207312)

By: /s/ Luisa S. Valle castro

Luisa S. Valle Castro, Esq.

(USDC No. 215611)

254 San José Street

Suite 5

San Juan, PR 00901-1523

Tel. 787-729-2900

Fax. 787-729-2203

E-Mail: [condecarmen@condelaw.com](mailto:condecarmen@condelaw.com)

*-and-*

**SCHULTE ROTH & ZABEL LLP**

By: /s/ Douglas S. Mintz

Douglas S. Mintz (admitted pro hac vice)

90115th Street, N.W., Suite 800

Washington, D.C. 20005

Telephone: (202) 729-7470

Facsimile: (202) 730-4520

E-mail: [douglas.mintz@srz.com](mailto:douglas.mintz@srz.com)

and

Douglas Koff (admitted pro hac vice)

Abbey Walsh (admitted pro hac vice)

Peter Amend (admitted pro hac vice)

919 Third Avenue

New York, N.Y. 10022

Telephone: (212) 756-2000

E-mail: [douglas.koff@srz.com](mailto:douglas.koff@srz.com)

[abbey.walsh@srz.com](mailto:abbey.walsh@srz.com)

[peter.amend@srz.com](mailto:peter.amend@srz.com)

***Attorneys for Cantor-Katz Collateral Monitor  
LLC, as Collateral Monitor for GDB Debt  
Recovery Authority***